

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO
RICO

as representative of:

THE COMMONWEALTH OF PUERTO
RICO, THE EMPLOYEE'S RETIREMENT
SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO,
AND THE PUERTO RICO PUBLIC
BUILDINGS AUTHORITY

Debtors

PROMESA
Title III

Case No. 17-bk-3283 (LTS)

(Jointly Administered)¹

**RESPONSE TO “FOUR HUNDRED SIXTY-EIGHT OMNIBUS OBJECTION
(NON-SUBSTANTIVE) OF PUERTO RICO ELECTRIC POWER
AUTHORITY TO BE SUBSEQUENTLY AMENDED CLAIMS”**

TO THE HONORABLE COURT:

COMES NOW **Isla del Río, Inc.** (“Isla”), a creditor in the captioned case, whom, through the undersigned legal counsel, very respectfully state, pray, and submits:

1. On May 8, 2018, Isla filed Claim No. 11464 in the amount of \$195,019.30. Afterwards, on March 10, 2022, Isla filed Claim No. 179740 in the amount of \$453,780.00. Both these claims were filed in the Puerto Rico Electric Power Authority (“PREPA”) case.

2. On May 13, 2022, the Financial Oversight and Management Board for Puerto Rico (the “Board”) filed the *Four Hundred Sixty-Eight Omnibus Objection (Non-*

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 35(787)66-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801).

Substantive) of Puerto Rico Electric Power Authority to Subsequently Amended Claims (the “Objection”) [Docket No. 20799]. In this Objection, the Board objected to Claim No. 11464 as a duplicate claim.

3. Isla submits that the Board is correct, Claim No. 179740 was meant to be filed as Amended Claim No. 11464. Therefore, Isla consents to the objection to the extent that Isla’s intention was to amend its claim only with respect to the amount and not to file a new claim.

4. Isla further submits that it will again make a non-substantive amendment to change the name and address where notices should be sent.

WHEREFORE, Isla hereby requests that this Honorable Court takes notice of the instant motion and that it grants any remedy it deems right and proper.

I HEREBY CERTIFY, that on this I electronically filed the foregoing with the Clerk of the Bankruptcy Court using the CM/ECF system, which will send electronic notification to all participants. Pursuant to the Fourteenth Amended Notice, Case Management and Administrative Procedures, the instant motion will be served tomorrow via First Class Mail upon the (i) Office of the United States Trustee, Edificio Ochoa, 500 Tanca Street, Suite 301, San Juan, P.R. 00901; (ii) Chambers of the Hon. Laura T. Swain; (iii) AAFAF and its counsel; (iv) the Oversight Board and its legal counsel, (v) Counsel for the Creditors Committee, (vi) Counsel for the Retiree Committee, the 20 largest creditors.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, this 13th day of June of 2022.

ISABEL FULLANA-FRATICELLI & ASSOCS., P.S.C.

The Hato Rey Center Bldg.
268 Ave. Ponce de León Ste. 1002
San Juan, Puerto Rico 00918
Telephone: (787) 250-7242
Facsimile: (787) 756-7800

/s/Isabel M. Fullana
USDCPR No. 126802
ifullana@gaflegal.com

/s/Eduardo J. Capdevila
USDCPR No. 302713
ecapdevila@gaflegal.com